



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 27 2015

CERTIFIED MAIL #7009 1680 0000 7641 2261
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Paul A. Pronishen, Plant Specialist
Ameresco Woodland Meadows Romulus LLC
4620 Hannan Road
Canton, Michigan 48188

Re: Request for Information
EPA ID No.: MIK678473448

Dear Mr. Pronishen:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Ameresco Woodland Meadows Romulus LLC (the facility or you) to submit certain information relating to treatment of landfill gas and generation of residues from waste treatment at its facility located at 4620 Hannan Road in Canton, Michigan. We are requiring this information to determine the facility's compliance status with the Standards Applicable to Generators of Hazardous Waste and Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities set forth at Michigan Administrative Code Rule (MAC R 299.9101-R 299.11009) and Title 40 of the Code of Federal Regulations (40 C.F.R.), Parts 124 and §§ 260-279. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Ms. Sue Brauer, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

Information may not be withheld from EPA or its authorized representative because it is viewed as confidential. However, you may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information provided in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Ameresco Woodland Meadows Romulus LLC must submit all requested information under a responsible corporate officer's signature stating:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of

documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

The term "responsible corporate officer" is defined at 40 C.F.R. § 270.11.

Should Ameresco Woodland Meadows Romulus LLC find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, you should notify EPA immediately. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. EPA may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Ameresco Woodland Meadows Romulus LLC to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Ms. Sue Brauer at (312) 353-6134.

Sincerely,



Julie Morris, Chief
Compliance Section 2

Enclosure

cc: Tracy Kecskemeti, Southeast District Office, MDEQ (w/ enclosure)
(KECSKEMETIT@michigan.gov)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
2. For the past three years, provide your waste determinations of the piped landfill gas for the following:
 - a. Characteristic of ignitability
 - b. Characteristic of corrosivity
 - c. Characteristic of reactivity
 - d. Characteristic of toxicity
 - e. Listed waste determination
 - f. Total organic concentration, in parts per million by weight, of waste where it enters the landfill gas treatment/methane recovery operation. (EPA Method 25D preferred.)For all of the above determinations, include moisture content, chain of custody and laboratory quality assurance/quality control documentation. If you have not performed such determinations in the past three years, explain why and provide the most recent determinations.

See Michigan Admin. Code (MAC) Rule 299, Part 2 (Identification and Listing of Hazardous Waste) and MAC R 299.9630 and 299.11003(1)(p) (40 C.F.R. Part 261 and § 265.1034(d)(1), Test Methods and Procedures for Air Emission Stds for Process Vents).

3. Provide documents quantifying the total Ameresco Woodland Meadows Romulus LLC process vent organic emissions hourly rate (i.e., above or below 1.4 kilogram/hour).
4. Provide documents quantifying the total Ameresco Woodland Meadows Romulus LLC process vent organic emissions annual rate (i.e., above or below 2.8 Megagram/year).
5. For the past three years, provide the following analyses of landfill gas treatment residue(s) (e.g., the oily waste removed from the gas condensate) for the following:
 - a. Characteristic of ignitability
 - b. Characteristic of corrosivity
 - c. Characteristic of reactivity
 - d. Characteristic of toxicity
 - e. Listed waste determination
 - f. Total organic concentration, in parts per million by weight at process vents from the tank used for separating oily waste from aqueous waste. (EPA Method 25D preferred.)

- g. Total organic concentration, in percentage by weight, of liquid waste where it enters the tank used for separating oily waste from aqueous waste.
- h. Whether the tank, used for separating oily waste from aqueous waste, is "in light liquid service" or "in heavy liquid service" as those terms are defined at 40 C.F.R. § 265.1031.

For the above determinations, include chain of custody, and laboratory quality assurance/quality control documentation. If you have not performed such determinations in the past three years, explain why and provide the most recent determinations.

See MAC R 299, Part 2, R 9630.11003(1) (40 C.F.R. Part 261, §§265.1034(d)(1), 265.1063(d), 268.7, 268.9, 268.38(e) and 268.40).

- 6. Identify the unit(s) located at Woodland Meadows landfill that receive(s) the aqueous phase of landfill gas condensate from you.
- 7. Identify the outfall, by number(s) and pretreatment permit or NPDES permit by state and federal number, through which the aqueous phase of your landfill gas condensate is discharged.
- 8. For the past three years, provide a copy of each uniform hazardous waste manifest used to ship oily waste removed from landfill gas condensate, from the facility to a destination facility.
- 9. For each uniform hazardous waste manifest provided in response to request 8 above, state whether the waste shipped was:
 - a. A discarded material that is abandoned by being disposed of; burned or incinerated; or accumulated, stored, or treated before or instead of being abandoned by being disposed of, burned, or incinerated (MAC R 299.9202(1)(a) ((40 C.F.R. § 261.2(b)); or
 - b. A material that is recycled, or accumulated, stored, or treated before recycling. If yes, which of the criteria in MAC R 299.9202(1)(b) (40 C.F.R. § 261.2(c)(2)) did it meet?
- 10. Is the landfill gas processed by you a recyclable material described in MAC R 299.9206 (40 C.F.R. § 261.6)? If yes, specify the recyclable material and identify the relevant regulatory subsection that applies.
- 11. Is the oily waste that is removed from the landfill gas condensate a recyclable material described in MAC R 299.9206 (40 C.F.R. § 261.6) (Requirements for recyclable materials)? If yes, identify the relevant regulatory subsection that applies.
- 12. Pursuant to 40 C.F.R. § 265.1030(d), has the owner or operator of Ameresco Woodland Meadows Romulus LLC certified that all of the process vents that would otherwise be subject to MAC R 299.9630 and 40 C.F.R. 265, Subpart AA, are equipped with and

operating air emission controls in accordance with the process vents requirements of an applicable Clean Air Act regulation codified under 40 C.F.R. Part 60, 61, or part 63? If yes, provide the certification.

13. Provide your 40 C.F.R. 265.1064(k)(3) analyses used to determine whether or not equipment at the facility is subject to the requirements of MAC R 299.9631 and 40 C.F.R. §§ 265.1052- 265.1060.
14. Provide your MAC R 299.934 (40 C.F.R. § 265.1090(j)), certification that each applicable waste management unit, not using Subpart CC air emission controls, is equipped with and operating air emission controls for the hazardous waste management unit in accordance with the requirements of a Clean Air Act regulation codified under 40 C.F.R. part 60, 61, or part 63. Identify those specific requirements with which each waste management unit is in compliance.

